

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, State Bar Number 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN LLP
14 16501 Ventura Blvd, Suite 400
15 Encino, California 91436
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendant
19 COMMONWEALTH LAND TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

22 Gary L. Compton, State Bar No. 1652
23 2950 E. Flamingo Road, Suite L
24 Las Vegas, Nevada 89121

25 **UNITED STATES DISTRICT COURT**

26 **DISTRICT OF NEVADA**

27 DEUTSCHE BANK NATIONAL TRUST
28 COMPANY,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:21-CV-00192-KJD-NJK

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
OPPOSITION TO MOTION TO
DISMISS OR PARTIAL SUMMARY
JUDGMENT (ECF No. 40)**

SECOND REQUEST

COMES NOW defendant Commonwealth Land Title Insurance Company
("Commonwealth") and plaintiff Deutsche Bank National Trust Company ("Deutsche Bank"), by
and through their respective attorneys of record, which hereby agree and stipulate as follows:

1. On December 29, 2021, Deutsche Bank filed its motion for partial summary

1 judgment (ECF No. 31);

2 2. On February 16, 2022, Commonwealth filed is opposition to Deutsche Bank's
3 motion for partial summary judgment and filed a countermotion for partial summary judgment
4 (ECF Nos. 39, 40);

5 3. On March 23, 2022, the Court granted the parties' first stipulation for an extension
6 of time to reply in support of the countermotion for partial summary judgment (ECF No. 44);

7 4. Counsel for Commonwealth requests a further two-week extension of its deadline
8 to file its reply in support of the countermotion for partial summary judgment, through and
9 including April 20, 2022, to afford Commonwealth's counsel additional time to review and
10 respond to Deutsche Bank's opposition.

11 5. Counsel for Deutsche Bank does not oppose the requested extension;

12 6. This is the second request for an extension made by counsel for Commonwealth,
13 which is made in good faith and not for the purposes of delay.

14 **IT IS SO STIPULATED** that Commonwealth's reply supporting its countermotion for
15 partial summary judgment (ECF No. 40) is extended through and including April 20, 2022.

16 Dated: March 31, 2022

SINCLAIR BRAUN LLP

17 By: /s/-Kevin S. Sinclair

18 KEVIN S. SINCLAIR
19 Attorneys for Defendants
20 FIDELITY NATIONAL TITLE GROUP,
INC. AND FIDELITY NATIONAL TITLE
GROUP, INC.

21 Dated: March 31, 2022


WRIGHT, FINLAY & ZAK, LLP

22 By: /s/-Lindsay D. Dragon

23 LINDSAY D. DRAGON
24 Attorneys for Plaintiff
DEUTSCHE BANK NATIONAL TRUST
COMPANY

25 **IT IS SO ORDERED.**

26 Dated this 4th day of April, 2022.

27 

28 KENT J. DAWSON
UNITED STATES DISTRICT JUDGE

STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO OPPOSITION TO MOTION TO

DISMISS